

2. Paragraphs 1, 2, 3, 4, 6-13 in my previous Declaration in this matter were made from my personal knowledge. Specifically, I have personal knowledge of the positions under my supervisory chain, including that Carlos Robles worked as a Patient Service Specialist, under my supervisory chain, from December 2008 until September 2013. I also have personal knowledge of the job duties of positions under my supervision, including the job duties of a PSS.
3. I recommended Mr. Robles' termination in September 2013. I have personal knowledge about the reasons why I recommended Mr. Robles' termination. I also have personal knowledge of Mr. Robles work performance and discipline in that I reviewed his employment file and discipline records prior to recommending his termination. I also discussed his work performance and disciplinary history with his immediate supervisor and Human Resources prior to recommending his termination.
4. Finally, I have personal knowledge of the disciplinary record of employees within my supervisory chain. I have never supervised any TTUHSC employee that has had a similar number of written disciplinary counselings, reprimands, or letters of final warning as Mr. Robles.

EXECUTED on May 28, 2015.


ALICIA GACHARNA